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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE *CORRECTED*
SUPPLEMENTAL DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' CONSOLIDATED *EX*
PARTE APPLICATION FOR
APPOINTMENT OF GUARDIANS *AD*
*LITEM***

Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for administrative relief to file under seal revised *Ex Parte* Applications for Appointment of Guardian *Ad Litem* (“Applications”), which are the Revised Exhibits attached to the *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Consolidated *Ex Parte* Application (“*Corrected* Supplemental Anderson Declaration”).

The Applications for which sealing is sought are:

- *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545 (Revised Exhibit 3);
- *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888 (Revised Exhibit 4);
- *Johnson (and as next of friend to minors K.L.J., J.A.J., and K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418 (Revised Exhibits 8, 9 and 10);
- *E.W. v. YouTube, LLC, et al.*, 4:22-cv-04528 (Revised Exhibit 11);
- *M.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04529 (Revised Exhibit 12);
- *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588 (Revised Exhibit 13);
- *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709 (Revised Exhibit 15);
- *J.H. (and as next of friend to minor N.R.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 16);
- *J.H. (and as next of friend to minor A.M.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 17);
- *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384 (Revised Exhibit 18);
- *L.A.T. (and as next of friend to minor L.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937 (Revised Exhibit 19);
- *S.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-06455 (Revised Exhibit 20);
- *Woods v. Meta Platforms, Inc., et al.*, 4:22-cv-6591 (Revised Exhibit 36);
- *V.P. v. Meta Platforms, Inc., et al.*, 4:22-cv-06617 (Revised Exhibit 37);
- *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546 (Revised Exhibit 38);
- *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565 (Revised Exhibit 39);
- *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573 (Revised Exhibit 40);
- *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873 (Revised Exhibit 41);

- *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150 (Revised Exhibit 45);
- *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162 (Revised Exhibit 47);
- *D.D., G.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06190 (Revised Exhibit 48);
- *I.A. v. Meta Platforms, Inc., et al.*, 4:22-cv-06252 (Revised Exhibit 52);
- *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263 (Revised Exhibit 54);
- *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306 (Revised Exhibit 56);
- *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685 (Revised Exhibit 60);
- *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692 (Revised Exhibit 61);
- *C.U. v. Snap Inc, et al.*, 4:22-cv-07347 (Revised Exhibit 64);
- *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886 (Revised Exhibit 67);
- *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165 (Revised Exhibit 68);
- *J.A., K.L., and A.L. v. TikTok, et al.*, 4:23-cv-00515 (Revised Exhibit 69);
- *G.W. v. Snap, Inc.*, 4:23-cv-00545 (Revised Exhibit 70);
- *L.A.T. (as next of friend to P.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937 (Revised Exhibit 71);
- *A.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-00646 (Revised Exhibit 73);
- *Wishkin v. Meta Platforms, Inc., et al.*, 4:22-cv-06459 (Revised Exhibit 74); and
- *D.D., J.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06205 (Revised Exhibit 75).

This motion is accompanied by a proposed order and the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Administrative Motion to Seal Exhibits to the *Corrected* Supplemental Declaration in Support of Plaintiffs’ *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl. ISO Admin. Mot. to Seal”). See Civ. L. R. 79-5(c).

This Court previously considered Plaintiffs’ request to seal applications for guardians *ad litem* in this case, and, on March 3, 2023, granted Plaintiffs’ request to seal at Docket Numbers 147-148 from the bench. ECF No. 16.

On March 15, 2023, this Court further ordered Plaintiffs to collect revised applications to cure deficiencies identified by the Court and to file revised applications under seal by March 24, 2023. ECF No. 188.

On March 24, 2023, Plaintiffs filed Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiffs' Consolidated *Ex Parte* Application (ECF No. 209), and on March 28, 2023, Plaintiffs filed a *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiffs' Consolidated *Ex Parte* Application attaching the Revised Applications.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants on March 27, 2023, to stipulate that these Revised Exhibits may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Revised Exhibits to the *Corrected* Supplemental Anderson Declaration filed.

Dated: March 28, 2023

Respectfully submitted,

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